

Ecology Addendum

Land North of Carisbrook Road, Mitcheldean. September 2026 (Rev A)

PINS Ref: APP/P1615/V/26/3378822

LPA Ref: P0672/25/OUT

1.0 Introduction

- 1.1 This report has been prepared by CSA Environmental on behalf of Gladman Developments in relation to land north of Carisbrook Road, Mitcheldean (the 'Site'). It provides a summary of the position with regards to ecology to inform an appeal.
- 1.2 This Statement has been authored by Kate Kibble MCIEEM, Principal Ecologist at CSA Environmental, and reviewed by Dr Aidan Marsh CEcol MCIEEM. Kate was the lead ecologist for survey work completed at the Site to inform the above application and has over 15 years' experience conducting survey work and undertaking ecological assessments.
- 1.3 The present appeal concerns an outline planning application for construction of up to 180 homes and associated public open space (with all matters reserved except for access) which was submitted to Forest of Dean District Council (FoDDC) in June 2025 (ref: P0672/25/OUT). This was supported by an Ecological Impact Assessment (EcIA) report containing the methods and results of habitat and bat survey work undertaken across 2024/2025. Reference was also made to past habitat, bat and reptile survey work undertaken at the Site since October 2018.
- 1.4 The application was reported to the council's planning committee on 09 June 2026 with a recommendation for delegated permission. However, as committee members resolved to refuse the application, the application has been called in by the Secretary of State (SoS).
- 1.5 The Council's decision cites four reasons for refusal, none of which make reference to biodiversity, protected sites, species or habitats. During the Appeal Case Management Conference, a position on ecology was agreed within the Statement of Common Ground and the Inspector requested a brief written statement be prepared to append to the Planning Proof, with particular reference made to the effect of the development on the Wye Valley and Forest of Dean Bat Special Area of Conservation (SAC).

2.0 Context

- 2.1 The Site comprises a 9.72ha agricultural field located at grid reference SO 664 193 to the north of Mitcheldean.
- 2.2 The outline application was supported by an Ecological Impact Assessment (EclA) report prepared by CSA Environmental (CD 1.8). The report included the methods and results of:
- Desktop study (June 2024)
 - Field survey (UKHab) (June 2024, with reference to earlier site conditions from 2018, 2019 and 2024).
 - Bat activity surveys were undertaken in line with the prevailing guidance and comprised:
 - Winter activity surveys (Two week's monitoring per month December 2019 - March 2019; 15 nights' static monitoring across December 2024 - February 2025)
 - Non winter activity surveys (monthly walked transects and 35 nights' static monitoring in October 2018 and April-September 2019; repeated June-October 2024, April-May 2025 with ten walked transect surveys and 35 night's monitoring)
 - Reptile presence/absence surveys (Seven visits between May-September 2019)
- 2.3 The application was also supported by a Biodiversity Net Gain calculation (Statutory Metric) (CD.1.11) and accompanying report (CD 1.10), as well as information to support the council's Habitats Regulations Assessment (CD 1.9). Further updates to these reports were submitted to FoDDC during 2025 and 2026 as described below.
- 2.4 A key ecological consideration at the Site was its proximity to Wigpool Ironstone Mine Site of Special Scientific Interest (SSSI), a component of the Wye Valley and Forest of Dean Bat Special Area of Conservation (SAC), and the potential impact of the proposed development on horseshoe bat species associated with the SAC. Consideration was also given to other European sites including the more distant Wye Valley Woodlands SAC. Extensive bat survey work was undertaken at the Site in line with the prevailing published guidance, with the proposed development designed to retain and protect key bat habitats. Additional considerations included boundary hedgerows and trees, badger, dormouse, nesting birds and reptiles.

3.0 Consultee Comments

Forest of Dean District Council

- 3.1 FoDDC first commented on the application on 17 July 2025 having undertaken their preliminary screening for Likely Significant Effects and concluding the need for Appropriate Assessment (CD 3.12-14). It was not possible to complete a full assessment in lieu of outstanding bat survey

work at the time of writing. A land-use parameters plan clearly showing horseshoe bat buffer zones was also required. Clarification was requested on an area of boundary scrub proposed for removal and whether there was a suitable bat flight path. The submitted Lighting Strategy (CD 1.21) was welcomed but further information relating to the impacts the development on hazel dormouse and ground nesting farmland birds was required. NatureSpace were to be consulted on potential impacts to great crested newt and the need for licensing. FoDDC also requested a second Statutory Metric be submitted to confirm that protected species mitigation was counted only up to 'no net loss' with sufficient additional biodiversity enhancements provided to deliver on-site gains. NatureSpace's response is provided as CD 3.18, recommending a condition for the management of on-site habitats during works to reduce the risk of harm to great crested newts.

- 3.2 To address FoDDC's comments, CSA submitted an updated EclA (CSA/4057/13C) and HRA report (CD 2.2) in October 2025 to contain the completed bat survey results and a finalised impact assessment. These submissions were accompanied by an Ecology Briefing Note (CD 2.4) which summarised the additional information and provided clarification on the initial points raised by FoDDC in their response of July 2025.
- 3.3 FoDDC provided further comments on 14 October 2025 (CD 3.21) pending further information on dormice, BNG and the landuse parameters plan. A repeat screening for LSE again concluded the need for an appropriate assessment (CD 3.22).
- 3.4 Following additional consultation by phone and email with the FoDDC ecologist, CSA submitted an Ecology Land-use Parameters Plan (CD 2.5), revised EclA (CD 2.1), BNG report (CD 2.3) and Statutory Metric (CD 2.6) in November 2025. The FoDDC ecologist responded on 04 December 2025 (CD 3.24) requesting clarification on the buffer zones illustrated on the Land-use Parameters Plan and stating that light levels and vegetation removals at the Site would need to be secured by condition.
- 3.5 Following provision of an updated Parameters Plan (CD 2.13 Rev A) and further discussions to clarify the development proposals and potential impacts to bats and their flightpaths, which included additional lighting information from DFL (CD 2.10), the FoDDC ecologist submitted a final response (dated 09 April 2026) which concluded no objection subject to conditions (CD 3.32). The council's appropriate assessment (CD 3.37-38) was undertaken and determined that planning conditions could be relied upon to avoid adverse effects on the integrity of the Wye Valley and Forest of Dean Bat SAC.
- 3.6 Ultimately, following provision of the full bat survey data, revised landuse parameters plan and biodiversity metric, as well as confirmation of

points relating to dormouse and habitat removal, all of FoDDC's initial comments were resolved.

Natural England

- 3.7 Comments on the planning application were submitted by Natural England on 03 July 2025 (CD 3.6). They stated that insufficient information had been received to enable them to provide a substantive response. At that time, CSA had provided a shadow HRA report (titled Information to Inform HRA CD 1.9) and the interim EclA (CD 1.8) containing partial bat survey work, and FoDDC had not yet completed their own appropriate assessment.
- 3.8 FoDDC completed their appropriate assessment on 10 April 2026 concluding no likely significant effects on European designated sites, subject to appropriate conditions (CD 3.34). On 13 April 2026, the Case Officer contacted Natural England to provide the appropriate assessment for review and on 30 April 2026 Natural England submitted their revised response (CD 3.37/3.38), which stated no objection to the application subject to appropriate mitigation (as set out within the Council's Appropriate Assessment dated 10 April 2026) being secured.

Gloucestershire Wildlife Trust

- 3.9 Gloucestershire Wildlife Trust (GWT) commented on the application prior to the receipt of completed bat survey data (CD 3.3). They identified the sensitivity of the Site in proximity to several nature reserves, principally Wigpool Iron Mine SSSI and identified concerns in relation to the incomplete survey data, stating there had been insufficient consideration of visitor pressure on local bat roosts, over-reliance on 'residents packs' to address this, and absence of defined dark corridors/movement buffers for bats. GWT also requested additional detail on the submitted lighting strategy and improved green infrastructure.
- 3.10 Following their response, the outstanding survey information was submitted to FoDDC and further information on recreational pressure, lighting and quantified bat habitat buffers were subsequently provided (CD 2.4, 2.5) in response to the FoDDC ecologist's consultation response. Hence their concerns are considered to have been addressed though no further response was provided.

Public Comments

- 3.11 Over 200 public comments specifically including reference to biodiversity or ecological matters were submitted to the application, a large proportion of which were very similar and appeared to be template objection points. The main points raised were loss of habitat, particularly for bats, but with mention of dormouse, great crested newt, slow-worm, badger and other wildlife, and disruption to bat flightpaths and foraging areas. The disturbance impact of lighting on wildlife

(particularly bats) was also frequently raised. A small number of comments related specifically to bat core sustenance zones, impacts to the Wye Valley and Forest of Dean Bats SAC and other local wildlife sites.

- 3.12 The ecology reports submitted explain the scope of detailed protected species survey work undertaken and the results of this work, with appropriate mitigation included where required. Full consideration of the Wye Valley and Forest of Dean Bats SAC, including the potential impact of the proposed development on commuting and foraging bats, was set out in detail within the submitted reports (CD 2.1, 2.2).

4.0 Legislation and the NPPF

- 4.1 Since submission of the outline application on 03 June 2025, the National Planning Policy Framework (NPPF) has been updated¹.

- 4.2 "Conserving the Natural Environment" now forms chapter 19 of the NPPF (previously Chapter 15) and is subdivided into policies N1 to N6. Aside from restructuring and renumbering of the chapter, the principles for preserving the natural environment are broadly unchanged, including following the hierarchy of protection for international, national and locally designated sites, promoting habitat restoration and enhancing ecological networks. Reference is included to Local Nature Recovery Strategies (LNRS) and the nature restoration levy. Specific policies relevant to the Site are included below.

- 4.3 Policy N2: Improving the natural environment, part 2 states:

2. if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then the development should be refused.

- 4.4 Policy N3: Trees in new development includes a new specific requirement to include street tree planting within new developments.

- 4.5 Former paragraph 195, which referred to the presumption in favour of sustainable development not applying where a plan or project was likely to have a significant effect on a habitats site, has been removed from the updated NPPF. Within the latest version of the NPPF, impacts to statutory sites are included within Policy N6: Areas of particular importance for biodiversity and geodiversity which states:

- 1. To support the conservation of important habitats, species and sites of geodiversity value, development proposals affecting:*

¹ Ministry of Housing, Communities & Local Government, 2026. *National Planning Policy Framework (NPPF): Plan making and national decision-making policies*. London: Ministry of Housing, Communities & Local Government.

- a. *A site of international importance, which for the purpose of this policy is a habitats site, should be refused unless:*
 - i. *An appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site (either individually or in combination with other developments) or the proposal can satisfy the derogation tests; and/or*
 - ii. *The impact of development on the relevant protected features of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.*

5.0 Conclusions

- 5.1 The Appeal scheme would result in the loss of farmland habitat and minor impacts to boundary vegetation, however the scheme provides significant buffers to the key horseshoe bat flight baths identified during survey work at the Site and a net gain in grassland, woodland, tree and scrub planting within these buffers, which is beneficial to the target species.
- 5.2 Further to final survey results and the development of the comprehensive mitigation strategy described, FoDDC concluded that the scheme would not have any likely significant effects on the Wye Valley and Forest of Dean Bat SAC. A number of conditions were proposed to secure other ecology mitigation and enhancement measures.